

1 DENNIS L. KENNEDY
2 Nevada Bar No. 1462
3 JOSEPH A. LIEBMAN
4 Nevada Bar No. 10125
5 BAILEY♦KENNEDY
6 8984 Spanish Ridge Avenue
7 Las Vegas, Nevada 89148-1302
8 (702) 562-8820 Telephone
9 (702) 562-8821 Facsimile
10 dkennedy@baileykennedy.com
11 jliebman@baileykennedy.com

7 WILLIAM B. FEDERMAN (*admitted pro hac vice*)
FEDERMAN & SHERWOOD
8 10205 N. Pennsylvania Avenue
Oklahoma City, Oklahoma 73120
9 (405) 235-1560 Telephone
0 (405) 239-2112 Facsimile
wbff@federmanlaw.com

1 | Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

5 KEVIN DROVER, individually and on behalf
of all others similarly situated;

Case No. 2:12-cv-00510-JCM-VCF

**STIPULATION AND ORDER
EXTENDING TIME TO RESPOND TO
DEFENDANT'S MOTION TO DISMISS
THE CLASS ACTION COMPLAINT
AND TO FILE REPLY BRIEF**

6 | Plaintiffs,

-7 | VS.

8 | LG ELECTRONICS USA, INC.,

Defendant.

(First Request)

Pursuant to Local Rules 6-1 and 7-1, Plaintiff Kevin Drover (“Plaintiff”), by and through his undersigned counsel, and Defendant LG Electronics USA, Inc. (“Defendant”), by and through its undersigned counsel, hereby respectfully submit this Stipulation and Order Extending Time to Respond to Defendant’s Motion to Dismiss the Class Action Complaint and to file a

1 Reply Brief. This is the First Request for an Extension of Time to File a Response to
2 Defendant's Motion to Dismiss. Defendant filed its Motion to Dismiss on May 25, 2012 and
3 Plaintiff's response is due on June 11, 2012. Defendant's Reply in support of its Motion to
4 Dismiss is due on June 18, 2012. Prior to the expiration of the date to respond, Plaintiff sought
5 an extension of time to respond due to the complexity of the issues contained within the Motion
6 to Dismiss. Further, Defendant seeks an extension of time in which to file a Reply brief in
7 support of the Motion to Dismiss.
8

9 Upon agreement by and between all the parties hereto as set forth herein, the undersigned
10 respectfully request this Court grant an extension of time, up to and including June 25, 2012 for
11 Plaintiff to file a response to Defendant's Motion to Dismiss and an extension of time, up to and
12 including July 23, 2012 for Defendant to file a Reply brief in further support of its Motion to
13 Dismiss.

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25

DATED: June 5, 2012.

1 2 /s/William B. Federman

2 3 WILLIAM B. FEDERMAN (*admitted pro hac
vice*)
4 FEDERMAN & SHERWOOD
5 10205 N. Pennsylvania Avenue
Oklahoma City, Oklahoma 73120
(405) 235-1560 Telephone
(405) 239-2112 Facsimile
wbf@federmanlaw.com

6
7 Dennis L. Kennedy, Esq. (NSBN 1462)
8 Joseph A. Liebman, Esq. (NSBN 10125)
9 BAILEY KENNEDY
8984 Spanish Ridge Avenue
10 Las Vegas, Nevada 89148-1302
Telephone: (702) 562-8820
Facsimile: (701) 562-9921
dkennedy@baileykennedy.com
jliebman@baileykennedy.com

11
12
13 Attorneys for Plaintiff Kevin Dровер

14 2 /s/Kristen Gallagher

3 Pat Lundvall, Esq. (NSBN 3761)
Kristen Gallagher, Esq. (NSBN 9561)
MCDONALD CARANO WILSON LLP
2300 West Sahara Avenue, Suite 1000
Las Vegas, Nevada 89102
Telephone: (702) 873-4100
Facsimile: (702) 873-9966
lundvall@mcdonaldcarano.com
kgallagher@mcdonaldcarano.com

4
5
6 Sandra C. McCallion, Esq.
7 Melanie Grossman, Esq.
8 COHEN & GRESSLER LLP
9 800 Third Avenue
New York, New York 10022
10 212 957 7600 phone
212 957 4514 fax
smccallion@cohengresser.com
mgrossman@cohengresser.com
(*pro hac vice* applications to be submitted)

11
12
13 Attorneys for Defendant LG Electronics, USA, Inc.

14
15
16
17 IT IS SO ORDERED:

18 19 
20 21 UNITED STATES DISTRICT JUDGE

22
23 24 DATED: June 8, 2012